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9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 FRANK MUNOZ, et al.,

16 Defendants.

No. CR 15-**C R 15-0688**

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING INDICTMENT AND
RELATED DOCUMENTS; DECLARATION OF
JUSTIN R. RHOADES

(UNDER SEAL)

17
18 The government hereby applies ex parte for an order that the
19 indictment and any related documents in the above-titled case (except
20 the arrest warrants for the charged defendants) be kept under seal
21 until the government files a "Report Commencing Criminal Action" in
22 this matter.

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1 This ex parte application is made pursuant to Federal Rule of
2 Criminal Procedure 6(e)(4) and is based on the attached declaration
3 of Justin R. Rhoades.

4 Dated: December 16, 2015

Respectfully submitted,

5 EILEEN M. DECKER
6 United States Attorney

7 LAWRENCE S. MIDDLETON
8 Assistant United States Attorney
9 Chief, Criminal Division

10 JUSTIN R. RHOADES
11 Assistant United States Attorney

12 Attorneys for Plaintiff
13 UNITED STATES OF AMERICA
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DECLARATION OF JUSTIN R. RHOADES

I, Justin R. Rhoades, declare as follows:

1. I am an Assistant United States Attorney in the United States Attorney's Office for the Central District of California. I am one of the attorneys representing the government in the prosecution of United States v. Frank Munoz, et al., the indictment in which is being presented to a federal grand jury in the Central District of California on December 16, 2015.

2. The defendants charged in the above-captioned indictment have not been taken into custody on the charges contained in the indictment and have not been informed that they are being named as defendants in the indictment to be presented to the grand jury on December 16, 2015. The likelihood of apprehending one or more of the charged defendants might jeopardized if the indictment in this case were made publicly available before the defendants are taken into custody on the indictment.

3. Accordingly, the government requests that the indictment and sealed documents in this case (except the arrest warrants) be sealed and remain so until one of the defendants is taken into custody on the charges contained in the indictment and the government files a "Report Commencing Criminal Action" in this matter.

4. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that this declaration is executed at Los Angeles, California, on December 16, 2015.


JUSTIN R. RHOADES